

Coos Chapter

Oregon Society of American Foresters

Chapter Comments On Wagon Road EA and FONSI

Coos Bay District BLM
1300 Airport Lane
North Bend, OR 97459-2000

December 12, 2011

The Coos Chapter of the Oregon Society of American Foresters (OSAF) is composed of 52 active members residing in Coos and Curry counties. We represent all sectors of forest management including family forests, private industry and State and Federal government agencies. We also have an active and highly experienced contingent of retired foresters from these same organizations and interests. We are closely associated with and coordinate our actions with the OSAF which is composed of over 950 foresters in Oregon.

Representatives from our Chapter have attended all field and office meetings on the above project in addition to the February 16th and 17th meetings on the Secretarial Pilot Projects in Canyonville. Following are our comments on the above two documents.

Early successional habitat The EA states that adjacent private industrial land does not provide adequate or quality early-successional habitat due to management practices such as aggressive reforestation and release treatments that result in densely reforested stands that truncate this seral stage. Several questions arise regarding this statement. No mention is made of the many reforested stands on which the BLM conducted regeneration harvests prior to and shortly after the Northwest Forest Plan was implemented nor on non-industrial private forestland. Were these plantations sampled (more than just determining age) to assess the quality and amount of early seral conditions? If so, were their acres considered in the assessment that early seral habitat is limiting? Finally, the term quality early-successional habitat needs to be defined so it can be separated from non-quality early-successional habitat.

Port Orford cedar management. We believe a site specific POC root disease control strategy should be developed for this project. In the body of this EA it is clear that ground-based logging methods and wet-season operations are planned or possible. A control strategy would assess logging systems and timing to determine their effects on existing and potential POC populations in the analysis area.

Under Monitoring - Reforestation. No mention was made about the need for conifer release. From our observation of potential competing vegetation during the field reviews there will be a need for some form of vegetation management to control the growth of these competing species. If the concern is about overstocking and shortening the early seral stage then this can be addressed by the precommercial thinning operations you are planning.

In relation to the above, the EA states that there will be a 3 year survival of 75%. What is the basis for this statement? From our experience with planting seedlings in brush-dominated environments with limited site preparation, “no release” creates a very risky survival situation. This is especially the case when working in an uneven-aged regime where seedling resources are limited by the remnant overstory. It should be noted that it is not just survival that is important; “free to grow” conditions need to be created so that planted trees can successfully compete with the brush species that increase as the result of timber harvest. Browse damage from both deer and elk is also a concern.

We have carefully reviewed chapters 3 and 4 (description and analysis of various resources) and have found it comprehensive and well done. Therefore, we fully support your declaration (FONSI) that the Wagon Road Pilot poses no significant impact to the environment.

These comments were reviewed and approved by the Coos Chapter’s Executive Council.

/s/ James Nielsen
Policy and Legislation Chair
Coos Chapter, OSAF
P.O. Box 1560
Coos Bay, OR 97420